

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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EMBER RUSSELL, :  
Plaintiff, :  
v. : CIVIL ACTION NO. 04-30031-KPN  
LONG VIEW RECREATIONAL :  
VEHICLES, INC. AND LONG VIEW :  
RV SUPERSTORES, :  
Defendant. :  
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**PLAINTIFF'S MOTION TO COMPEL DISCOVERY**

The plaintiff hereby moves to compel adequate responses to written discovery timely served upon the defendant. As grounds therefore, the plaintiff submits a Memorandum in support of this motion, and states that the defendant failed to respond adequately to written requests for discovery as follows: Interrogatories; 11-13, 15, 20-21 and Document Requests 1-3, 9, 11-13-22, and 24-30.

WHEREFORE, the plaintiff requests that this court:

1. Order the defendant to respond completely and fully to Interrogatories 11-13, 15, 20-21; and Document Requests 1-3, 9, 11-20, 22, and 24-30 within ten days; and

2. Award the plaintiff her reasonable attorney's fees and costs in prosecuting this motion.

CERTIFICATION PURSUANT TO LOCAL RULES 7.1(A)(2) and 37.1(B)

I certify that I have attempted in good faith to resolve or narrow the issues raised in this motion at a discovery conference, and have not been able to reach an agreement on discovery requests which are the subject of this Motion.

EMBER RUSSELL  
By her attorney,

/s/ Suzanne Garrow  
Suzanne Garrow BBO # 636548  
Heisler, Feldman & McCormick, P.C.  
1145 Main Street, Suite 508  
Springfield MA 01103  
(413)788-7988  
(413)788-7996 (fax)

Dated: December 22, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was served by electronic and first class mail upon the attorney of record for the defendants on December 22, 2004.

/s/ Suzanne Garrow  
Suzanne Garrow